

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

RANDALL NORRIS and MISTY NORRIS, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

T-MOBILE USA, INC.,

Defendant.

No. 2:21-cv-01153-BJR

**STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER  
COMPLAINT**

Under Western District of Washington Local Rules 7(d)(1) and 10(g), Plaintiffs Randall Norris and Misty Norris and Defendant T-Mobile USA, Inc., (“the Parties”), stipulate that T-Mobile’s deadline to answer or otherwise respond to the Complaint in the above-captioned action is extended for a total of 30 days, through October 25, 2021.<sup>1</sup>

Good cause exists for this extension, as there is a pending motion before the Judicial Panel on Multidistrict Litigation (“JPML”) regarding transfer and coordination or consolidation of related cases for pretrial proceedings under 28 U.S.C. § 1407, filed on August 23, 2021. *See In re T-Mobile Customer Data Security Breach Litigation.*, MDL Docket No. 3019 (ECF No. 1). The

---

<sup>1</sup> Thirty days from T-Mobile’s current response deadline is Saturday, October 23, 2021. *See* ECF No. 11 (service of process dated September 2, 2021); Fed. R. Civ. P. 12(a). So T-Mobile’s new deadline would “run until the end of the next day that is not a Saturday, Sunday, or legal holiday.” Fed. R. Civ. P. 6(a)(1)(C).

STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER  
COMPLAINT  
(No. 2:21-cv-01153-BJR) - 1

153887548.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

1 plaintiffs in another case, *Daruwalla v. T-Mobile USA, Inc.*, No. 2:21-cv-1118 (W.D. Wash. filed  
 2 Aug. 19, 2021), filed the transfer motion and identified this case, and numerous others, as related  
 3 cases that should be transferred. *Id.* (ECF Nos. 1, 8-1, 11, 20). The additional 30 days will  
 4 conserve judicial resources by allowing T-Mobile to assess the pending JPML motion and continue  
 5 discussions with Plaintiff's counsel here and counsel in the related cases before responding to  
 6 Plaintiff's Complaint.

7  
 8 Dated: September 16, 2021

9 By: /s/ Steve Y. Koh

10 Steve Y. Koh, WSBA No. 23284  
 Kathleen M. O'Sullivan, WSBA No. 27850  
 Lauren J. Tsuji, WSBA No. 55839

11 **PERKINS COIE LLP**

12 1201 Third Avenue, Suite 4900  
 Seattle, WA 98101-3099  
 Telephone: 206.359.8000  
 Facsimile: 206.359.9000  
 E-mail: SKoh@perkinscoie.com  
 14 KOSullivan@perkinscoie.com  
 LTsuji@perkinscoie.com

15 Kristine McAlister Brown (*pro hac vice* forthcoming)

16 **ALSTON & BIRD LLP**

17 1201 West Peachtree Street  
 Atlanta, GA 30309  
 Telephone: (404) 881-7000  
 Facsimile: (404) 881-7777  
 E-Mail: kristy.brown@alston.com

19 *Attorneys for Defendant T-Mobile USA, Inc.*

20  
 21 By: /s/ Stephen P. Connor

22 Stephen P. Connor  
 Anne-Marie E. Sargent  
 Derik Campos

23 **CONNOR & SARGENT PLLC**

24 921 Hildebrand Lane NE, Suite 240

STIPULATION AND ORDER TO  
 EXTEND TIME TO ANSWER  
 COMPLAINT  
 (No. 2:21-cv-01153-BJR) - 2

153887548.1

**Perkins Coie LLP**

1201 Third Avenue, Suite 4900  
 Seattle, WA 98101-3099  
 Phone: 206.359.8000  
 Fax: 206.359.9000

1 Bainbridge Island, Washington 98110  
Telephone: (206) 654-5050  
2 E-Mail: steve@cslawfirm.net  
aes@cslawfirm.net  
3 derik@cslawfirm.net

4 Gary F. Lynch (*pro hac vice*)  
Nicholas A. Colella (*pro hac vice*)  
5 **CARLSON LYNCH, LLP**  
1133 Penn Avenue, 5th Floor  
6 Pittsburgh, PA 15222  
E-Mail: glynch@carlsonlynch.com  
7 ncolella@carlsonlynch.com  
Telephone: (412) 322-9243  
8 Facsimile: (412) 231-0246

9 Joseph P. Guglielmo (*pro hac vice*)  
Carey Alexander (*pro hac vice*)  
10 **SCOTT + SCOTT LLP**  
The Helmsley Building  
11 230 Park Avenue, 17th Floor  
New York, NY 10169  
12 E-Mail: jguglielmo@scott-scott.com  
calexander@scott-scott.com

13 Erin Green Comite (*pro hac vice*)  
14 **SCOTT + SCOTT LLP LLP**  
156 South Main Stree  
15 PO Box 192  
Colchester, CT 06415  
16 860-537-5537  
Fax: 860-537-4432  
17 Email: ecomite@scott-scott.com

18 Brian C. Gudmudson (*pro hac vice forthcoming*)  
**ZIMMERMAN REED LLP**  
19 1100 IDS Center  
80 South 8th Street  
20 Minneapolis, MN 55402  
E-Mail: brian.gudmudson@zimmreed.com

21 MaryBeth V. Gibson (*pro hac vice forthcoming*)  
22 **The Finley Firm, P.C.**  
3535 Piedmont Road  
23 Building 14, Suite 230

24  
STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER  
COMPLAINT  
(No. 2:21-cv-01153-BJR) - 3

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

1 Atlanta, GA 30305  
E-Mail: mgibson@thefinleyfirm.com

2 Arthur M. Murray (*pro hac vice forthcoming*)

3 **MURRAY LAW FIRM**

701 Poydras Street

4 New Orleans, LA 70139

E-Mail: amurray@murray-lawfirm.com

5 *Attorneys for Plaintiffs*

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER  
COMPLAINT  
(No. 2:21-cv-01153-BJR) - 4

153887548.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

**ORDER**

IT IS SO ORDERED.

Dated this 16th day of September 2021.

s/Barbara J. Rothstein

Barbara J. Rothstein  
U.S. District Court Judge

Presented by:

/s/ Steve Y. Koh

Steve Y. Koh, WSBA No. 23284  
Kathleen M. O'Sullivan, WSBA No. 27850  
Lauren J. Tsuji, WSBA No. 55839

**PERKINS COIE LLP**

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

E-mail: SKoh@perkinscoie.com

KOSullivan@perkinscoie.com

LTsuji@perkinscoie.com

Kristine McAlister Brown (*pro hac vice* forthcoming)

**ALSTON & BIRD LLP**

1201 West Peachtree Street

Atlanta, GA 30309

Telephone: (404) 881-7000

Facsimile: (404) 881-7777

E-Mail: kristy.brown@alston.com

*Attorneys for Defendant T-Mobile USA, Inc.*

**Perkins Coie LLP**

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Phone: 206.359.8000

Fax: 206.359.9000

STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER  
COMPLAINT

(No. 2:21-cv-01153-BJR) - 5